

# EXHIBIT

# 15

**Kirk, Brittany E. (SHB)**

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**From:** Bret Stanley <bstanley@johnsonlawgroup.com>  
**Sent:** Friday, July 11, 2025 12:15 PM  
**To:** Gromada, Veronica G. (SHB); Steven Cohn; Oot, Patrick L. (SHB); Shortnacy, Michael (SHB); Wikler, Jeremy (SHB); Priest Johnson, Kimberly (SHB); Cotton, Chris (SHB); Haider, Jay B. (SHB)  
**Cc:** Roopal Luhana; Rachel Abrams; Sarah London; Andrew Kaufman; Meredith Stratigopoulos; Sara Peters; Marlene Goldenberg; Ellyn Hurd; Khaldoun Baghdadi; Alexandra Walsh; Brian Abramson; Beth Wilkins; Kirk, Brittany E. (SHB)  
**Subject:** RE: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

**EXTERNAL**

Veronica –

I cannot agree with your proposal. As you know, I have not shared or produced any confidential documents, summaries, or other substantive information from Uber documents with anyone who is not party to the MDL 3084 Protective Order. I have made Requests for Production identifying Knowledge Base Policies and Articles by name in the *Smith* and *Lord matters*. As you recall, I did the exact same thing early in the discovery process of MDL 3084 and supplied your team with names of policies prior to any production from Knowledge Base.

Per your request, I confirm that the only matters I have made requests for production of KB Policies / Articles specifically by name are the *Smith* and *Lord matters*.

Functionally, a requirement that I am to seek permission from Uber before making discovery requests on relevant and discoverable documents is not workable. Likewise, a requirement that I should seek court intervention from the Northern District of California every time I need discovery on relevant and discoverable documents is not workable.

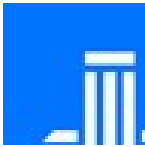
Additionally, your proposal does not work because it assumes that Uber will make productions of Knowledge Base Policies and Articles in connection with general request for production – without asking for the documents by name. Uber refused to make production of these Policies in MDL 3084 until we sought them specifically by name. Likewise, Uber has refused to make these productions in the *Lord* or *Smith matters* in connection with prior more general requests for production.

After a hearing this week in the *Lord matter*, I'm very concerned with the way your team and Uber has characterized the Knowledge Base System to Bowman and Brooke attorneys (who represent Uber in the *Lord matter*). The Bowman and Brooke attorney for Uber made patent misstatements on the record concerning Knowledge Base Policies and Articles. Mischaracterizations and misstatements on the record about these documents are attempts by Uber to withhold them and proves the need for specificity in discovery requests to obtain production.

Finally, Uber is obstructing discovery in the *Smith matter* by refusing to respond to discovery under the guise that I have breached MDL 3084's Protective Order.

These actions need to be brought in front of the Court. Since it is your claim, we need to discuss a filing and response schedule.

Sincerely,



**Bret Stanley** | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098

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**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Thursday, July 10, 2025 1:23 PM

**To:** Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Oot, Patrick L. (SHB) <[OOT@shb.com](mailto:OOT@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Wikler, Jeremy (SHB) <[JWIKLER@shb.com](mailto:JWIKLER@shb.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Cotton, Chris (SHB) <[CCOTTON@shb.com](mailto:CCOTTON@shb.com)>; Haider, Jay B. (SHB) <[jhaider@shb.com](mailto:jhaider@shb.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Meredith Stratigopoulos <[mdrukker@edelson.com](mailto:mdrukker@edelson.com)>; Sara Peters <[speters@walkuplawoffice.com](mailto:speters@walkuplawoffice.com)>; Marlene Goldenberg <[mgoldenberg@nighgoldenberglaw.com](mailto:mgoldenberg@nighgoldenberglaw.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Khaldoun Baghdadi <[kbaghdadi@walkuplawoffice.com](mailto:kbaghdadi@walkuplawoffice.com)>; Alexandra Walsh <[awalsh@anapolweiss.com](mailto:awalsh@anapolweiss.com)>; Brian Abramson <[babramson@whlaw.com](mailto:babramson@whlaw.com)>; Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>

**Subject:** In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

[EXTERNAL]

Bret and Steve,

We are following up regarding our proposal to resolve the Protective Order dispute. Please let us know your position by tomorrow.

Thank you.

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**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Tuesday, July 8, 2025 3:51 PM

**To:** Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Oot, Patrick L. (SHB) <[OOT@shb.com](mailto:OOT@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Wikler, Jeremy (SHB) <[JWIKLER@shb.com](mailto:JWIKLER@shb.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Cotton, Chris (SHB) <[CCOTTON@shb.com](mailto:CCOTTON@shb.com)>; Haider, Jay B. (SHB) <[jhaider@shb.com](mailto:jhaider@shb.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Meredith Stratigopoulos

<[mdrukker@edelson.com](mailto:mdrukker@edelson.com)>; Sara Peters <[speters@walkuplawoffice.com](mailto:speters@walkuplawoffice.com)>; Marlene Goldenberg <[mgoldenberg@nighgoldenberg.com](mailto:mgoldenberg@nighgoldenberg.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Khaldoun Baghdadi <[kbaghdadi@walkuplawoffice.com](mailto:kbaghdadi@walkuplawoffice.com)>; Alexandra Walsh <[awalsh@anapolweiss.com](mailto:awalsh@anapolweiss.com)>; Brian Abramson <[babramson@whlaw.com](mailto:babramson@whlaw.com)>; Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>  
**Subject:** RE: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Thank you.

---

**From:** Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Sent:** Tuesday, July 8, 2025 3:19 PM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Oot, Patrick L. (SHB) <[OOT@shb.com](mailto:OOT@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Wikler, Jeremy (SHB) <[JWIKLER@shb.com](mailto:JWIKLER@shb.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Cotton, Chris (SHB) <[CCOTTON@shb.com](mailto:CCOTTON@shb.com)>; Haider, Jay B. (SHB) <[jhaider@shb.com](mailto:jhaider@shb.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Meredith Stratigopoulos <[mdrukker@edelson.com](mailto:mdrukker@edelson.com)>; Sara Peters <[speters@walkuplawoffice.com](mailto:speters@walkuplawoffice.com)>; Marlene Goldenberg <[mgoldenberg@nighgoldenberg.com](mailto:mgoldenberg@nighgoldenberg.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Khaldoun Baghdadi <[kbaghdadi@walkuplawoffice.com](mailto:kbaghdadi@walkuplawoffice.com)>; Alexandra Walsh <[awalsh@anapolweiss.com](mailto:awalsh@anapolweiss.com)>; Brian Abramson <[babramson@whlaw.com](mailto:babramson@whlaw.com)>; Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>

**Subject:** RE: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

## EXTERNAL

Veronica,

I will discuss this with our team and get back with you.

Sincerely,



**Bret Stanley** | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098

Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460

[BStanley@johnsonlawgroup.com](mailto:BStanley@johnsonlawgroup.com) | [www.johnsonlawgroup.com](http://www.johnsonlawgroup.com)

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---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Tuesday, July 8, 2025 11:33 AM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Oot, Patrick L. (SHB) <[OOT@shb.com](mailto:OOT@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Wikler, Jeremy (SHB) <[JWIKLER@shb.com](mailto:JWIKLER@shb.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Cotton, Chris (SHB) <[CCOTTON@shb.com](mailto:CCOTTON@shb.com)>; Haider, Jay B. (SHB) <[jhaider@shb.com](mailto:jhaider@shb.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Meredith Stratigopoulos <[mdrukker@edelson.com](mailto:mdrukker@edelson.com)>; Sara Peters <[speters@walkuplawoffice.com](mailto:speters@walkuplawoffice.com)>; Marlene Goldenberg <[mgoldenberg@nighgoldenberg.com](mailto:mgoldenberg@nighgoldenberg.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Khaldoun Baghdadi

<[kbaghdadi@walkuplawoffice.com](mailto:kbaghdadi@walkuplawoffice.com)>; Alexandra Walsh <[awalsh@anapolweiss.com](mailto:awalsh@anapolweiss.com)>; Brian Abramson <[babramson@whlaw.com](mailto:babramson@whlaw.com)>; Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>  
**Subject:** In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

[EXTERNAL]

Bret and Steve,

Thank you for taking the time to confer last week regarding the Protective Order violation dispute.

Based on the call, we understand your position to be that the names of Uber's policies, Knowledge Bases, or related documents (generally referred to herein as "policies") are not confidential. We understand your position to be that it promotes "efficiency" to use the names of Uber policies identified in the MDL in other cases because you believe Uber is improperly failing to produce those policies in other litigation.

We asked for confirmation that you were not claiming that any particular document produced by Uber in the MDL was improperly designated as Confidential or Highly Confidential – Attorney's Eyes Only. You confirmed that this is not your position.

We then attempted to determine whether you contend that Uber policy names are not confidential even when the policy name was identified by reviewing the content of a Confidential MDL document. As an example, we shared an image of one Confidential MDL document, UBER\_JCCP\_MDL\_000250806. We asked (twice) whether you agreed that the content of this document was confidential under the Protective Order. You did not answer this question, asked us to take the image down, and indicated that you did not believe it was productive to discuss specific documents. Instead, you reiterated your position that the names of Uber's policies are not confidential and invited Uber to file a motion if it disagreed.

When we ended the call, we agreed to try to identify a compromise that would avoid the need for court intervention and invited you to do the same. Unfortunately, based on your position, we are unable to identify a compromise on the substance of the dispute. Based on our understanding of your position, there appears to be no limiting principle that would prevent MDL plaintiffs' counsel from reviewing millions of pages of confidential MDL production to identify the names of documents they wish to request in other matters.

If we have misstated your position above, please let us know.

While we were not able to identify a compromise on the substance of the dispute, we do have a proposal to "agree to disagree" as follows:

1. You confirm that the only cases in which the names of Uber policies identified in the MDL have been used are the *Smith* and *Lord* cases identified in our letter; and,
2. You agree that before using the names of Uber policies or other information from confidential documents identified in the MDL in any other case, you will seek either Uber's permission or permission from the MDL Court.

Please let us know your position on this proposal or whether you have any other compromise suggestions.

**Veronica G. Gromada**

*Partner*

Shook, Hardy & Bacon L.L.P.

713-546-5683 | [vgromada@shb.com](mailto:vgromada@shb.com)



---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Monday, June 30, 2025 3:32 PM

**To:** Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Oot, Patrick L. (SHB) <[oot@shb.com](mailto:oot@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Wikler, Jeremy (SHB) <[jwikler@shb.com](mailto:jwikler@shb.com)>; Priest Johnson, Kimberly (SHB) <[kpi@shb.com](mailto:kpi@shb.com)>; Cotton, Chris (SHB) <[ccotton@shb.com](mailto:ccotton@shb.com)>; Haider, Jay B. (SHB) <[jhaider@shb.com](mailto:jhaider@shb.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Meredith Stratigopoulos <[mdrukker@edelson.com](mailto:mdrukker@edelson.com)>; Sara Peters <[speters@walkuplawoffice.com](mailto:speters@walkuplawoffice.com)>; Marlene Goldenberg <[mgoldenberg@nighgoldenberglaw.com](mailto:mgoldenberg@nighgoldenberglaw.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Khaldoun Baghdadi <[kbaghdadi@walkuplawoffice.com](mailto:kbaghdadi@walkuplawoffice.com)>; Alexandra Walsh <[awalsh@anapolweiss.com](mailto:awalsh@anapolweiss.com)>; Brian Abramson <[babramson@whlaw.com](mailto:babramson@whlaw.com)>; Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>

**Subject:** Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

## EXTERNAL

Veronica,

I'll be handling this issue on behalf of the PSC. My understanding was the meet and confer is at 5 EST. If that is correct, can you please forward me the invite. If not, I'm available tomorrow morning to meet and confer on this issue.

Thank you,  
Steve

---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Monday, June 30, 2025 4:08 PM

**To:** Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Oot, Patrick L. (SHB) <[oot@shb.com](mailto:oot@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Wikler, Jeremy (SHB) <[jwikler@shb.com](mailto:jwikler@shb.com)>; Priest Johnson, Kimberly (SHB) <[kpi@shb.com](mailto:kpi@shb.com)>; Cotton, Chris (SHB) <[ccotton@shb.com](mailto:ccotton@shb.com)>; Haider, Jay B. (SHB) <[jhaider@shb.com](mailto:jhaider@shb.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Meredith Stratigopoulos <[mdrukker@edelson.com](mailto:mdrukker@edelson.com)>; Sara Peters <[speters@walkuplawoffice.com](mailto:speters@walkuplawoffice.com)>; Marlene Goldenberg <[mgoldenberg@nighgoldenberglaw.com](mailto:mgoldenberg@nighgoldenberglaw.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Khaldoun Baghdadi <[kbaghdadi@walkuplawoffice.com](mailto:kbaghdadi@walkuplawoffice.com)>; Alexandra Walsh <[awalsh@anapolweiss.com](mailto:awalsh@anapolweiss.com)>; Brian Abramson <[babramson@whlaw.com](mailto:babramson@whlaw.com)>; Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>

**Subject:** Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Veronica,

I did not receive the Zoom invitation for the meet and confer on this issue - can you please forward it?

Thank you,  
Steve

---

**From:** Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Sent:** Thursday, June 19, 2025 9:23 AM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Oot, Patrick L. (SHB) <[oot@shb.com](mailto:oot@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Wikler, Jeremy (SHB) <[jwikler@shb.com](mailto:jwikler@shb.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Cotton, Chris (SHB) <[ccotton@shb.com](mailto:ccotton@shb.com)>; Haider, Jay B. (SHB) <[jhaider@shb.com](mailto:jhaider@shb.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Meredith Stratigopoulos <[mdrukker@edelson.com](mailto:mdrukker@edelson.com)>; Sara Peters <[speters@walkuplawoffice.com](mailto:speters@walkuplawoffice.com)>; Marlene Goldenberg <[mgoldenberg@nighgoldenberglaw.com](mailto:mgoldenberg@nighgoldenberglaw.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Khaldoun Baghdadi <[kbaghdadi@walkuplawoffice.com](mailto:kbaghdadi@walkuplawoffice.com)>; Alexandra Walsh <[awalsh@anapolweiss.com](mailto:awalsh@anapolweiss.com)>; Brian Abramson <[babramson@whlaw.com](mailto:babramson@whlaw.com)>; Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>

**Subject:** RE: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Veronica – can your team meet tomorrow on this?



**Bret Stanley** | Senior Counsel

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---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Wednesday, June 18, 2025 11:10 AM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Oot, Patrick L. (SHB) <[oot@shb.com](mailto:oot@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Wikler, Jeremy (SHB) <[jwikler@shb.com](mailto:jwikler@shb.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Cotton, Chris (SHB) <[ccotton@shb.com](mailto:ccotton@shb.com)>; Haider, Jay B. (SHB) <[jhaider@shb.com](mailto:jhaider@shb.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Meredith Stratigopoulos <[mdrukker@edelson.com](mailto:mdrukker@edelson.com)>; Sara Peters <[speters@walkuplawoffice.com](mailto:speters@walkuplawoffice.com)>; Marlene Goldenberg <[mgoldenberg@nighgoldenberglaw.com](mailto:mgoldenberg@nighgoldenberglaw.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Khaldoun Baghdadi <[kbaghdadi@walkuplawoffice.com](mailto:kbaghdadi@walkuplawoffice.com)>; Alexandra Walsh <[awalsh@anapolweiss.com](mailto:awalsh@anapolweiss.com)>; Brian Abramson <[babramson@whlaw.com](mailto:babramson@whlaw.com)>; Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>

**Subject:** Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

[EXTERNAL]



Veronica,

Unfortunately, those times today do not work for us. Does 2pm EST on Friday work? If not, please let us know your availability on Friday.

Thanks,  
Steve

**Steven Cohn | Partner**

**E:** [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)

**P:** (347) 269-4465

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---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Tuesday, June 17, 2025 4:55 PM

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**Subject:** In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Counsel,



Please advise if Plaintiffs are available for a meet and confer tomorrow between 10am-12pm CT or 4-6pm CT regarding Bret Stanley's Protective Order violations.

Thank you.

---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Wednesday, June 4, 2025 2:24 PM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Oot, Patrick L. (SHB) <[oot@shb.com](mailto:oot@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Wikler, Jeremy (SHB) <[jwikler@shb.com](mailto:jwikler@shb.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Cotton, Chris (SHB) <[ccotton@shb.com](mailto:ccotton@shb.com)>; Haider, Jay B. (SHB) <[jhaider@shb.com](mailto:jhaider@shb.com)>

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**Subject:** Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

## EXTERNAL

Counsel,

Please see the attached correspondence.

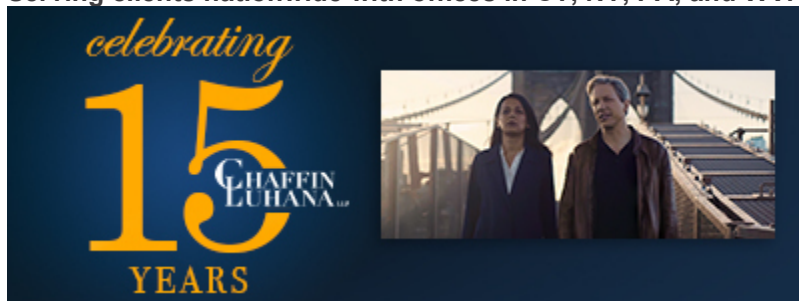
Regards,  
Steve

**Steven Cohn | Partner**

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